

**From:** John Jacobson JJacobson@rjfirms.com   
**Subject:** RE: Hunt v. Southern Baptist Convention, et al.  
**Date:** August 11, 2023 at 12:52 PM

JJ

**To:** Patrick Sanders patrick.sanders@macgilllaw.com, DeDe Gibby DGibby@rjfirms.com  
**Cc:** robert.macgill@macgilllaw.com, scott.murray@macgilllaw.com, Kathy Klein KKlein@rjfirms.com, mintz@mintzandgold.com, mccormick@mintzandgold.com, Andy Goldstein agoldstein@colelawgroupcc.com, Todd Cole tcole@colelawgroupcc.com, Nokes, Scarlett snokes@bradley.com, Bundren, Brandon bbundren@bradley.com, tpresnell@bradley.com, Gene Besen gbesen@bradley.com, gmarchetti@tpmblaw.com, Matt Pietsch matt@tpmblaw.com

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Patrick:

As I stated in my July 28 letter, Guidepost has engaged an ESI vendor to assist in the identification and collection of responsive documents to Plaintiff's requests. That process is ongoing. After those documents have been collected, they will, of course, need to be reviewed for responsiveness and privilege by counsel. We anticipate that process to be completed around Labor Day, with production of responsive, non-privileged documents soon thereafter.

John

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**From:** Patrick Sanders <patrick.sanders@macgilllaw.com>  
**Sent:** Tuesday, August 8, 2023 9:59 AM  
**To:** DeDe Gibby <DGibby@rjfirms.com>  
**Cc:** robert.macgill@macgilllaw.com; scott.murray@macgilllaw.com; John Jacobson <JJacobson@rjfirms.com>; Kathy Klein <KKlein@rjfirms.com>; mintz@mintzandgold.com; mccormick@mintzandgold.com; Andy Goldstein <agoldstein@colelawgroupcc.com>; Todd Cole <tcole@colelawgroupcc.com>; Nokes, Scarlett <snokes@bradley.com>; Bundren, Brandon <bbundren@bradley.com>; tpresnell@bradley.com; Gene Besen <gbesen@bradley.com>; gmarchetti@tpmblaw.com; Matt Pietsch <matt@tpmblaw.com>  
**Subject:** Re: Hunt v. Southern Baptist Convention, et al.

John,

We continue to wait on Guidepost to produce documents. Will you commit to supplementing your discovery responses along with a full and complete document production by August 11?

If you are unable to provide supplemental discovery responses and a full and complete production by August 11, we will understand that we are at issue on these topics and will need to schedule a call next week to discuss the issues.

Best regards,

**Patrick Sanders**  
Associate  
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On Fri, Jul 28, 2023 at 3:21 PM DeDe Gibby <[DGibby@rjfirms.com](mailto:DGibby@rjfirms.com)> wrote:

Counsel,

Please see attached correspondence from John Jacobson in the referenced matter.

Thank you,  
DeDe



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